

REMARKS

Applicants have thoroughly considered the December 4, 2006 Office action. This Amendment A amends claims 1, 3, 11, and 17 to more clearly set forth the invention. The claims are amended by incorporating subject matters previously presented in dependent claims. As such, Applicants respectfully request that favorable reconsideration of the application in light of the amendments and following remarks and invite the Examiner to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

Applicants acknowledge Examiner's agreement with Applicants' traversal of the elected claims such that claims 1-26 should be examined simultaneously.

As a preliminary matter, Applicants request the Examiner indicate whether the drawings submitted on April 6, 2004 have been accepted.

Claim Rejection under 35 U.S.C. §102(e)

Claims 1-25 stand rejected under 35 U.S.C. §102(e) as being anticipated by Morgan et al (US Pub. No. 2005/0071754). Applicants submit that Morgan fails to disclose each and every element of the invention as recited in claims 1-25.

Amended claim 1 recites, in part:

“receiving a request from a user to implement a change in configuration data, said configuration data relating to an operation of a client;
storing the received request in a memory area;
requesting topology data from the memory area based on the configuration data, said topology data defining a relationship between the client and the configuration data;
receiving the requested topology data from the memory area, said received topology data identifying the client **in response to the received request from the user**;
identifying a notification service associated with the identified client; and
notifying the identified notification service of the change in the configuration data, wherein notifying includes **generating a notification manifest identifying the client, said notification manifest defining the change in configuration data and specifying the client affected by the change.**”

Embodiments of the invention provide a central management of configuration data across a large group of clients by receiving a request from a user prior to identifying changes in the configuration. As configuration data identifies an operation of a client, changes to be applied are

not “pushed” to the client. In fact, aspects of the invention involve user interactions and the identification of the topology data, which identifies the client to receive the changes in configuration data, is performed **in response to the user’s request**.

Contrary to the Office’s assertion and interpretation, Applicants submit that Morgan discloses or suggest a “push” style, “upstream” system in applying changes to web-based display pages. In doing so, Morgan discloses “an upstream delivery [that] may be implemented by **identifying, at a central server, event triggers that indicate that certain data have changed** (emphasis added).” (Morgan, page 4, para. 0004). In other words, Morgan provides at least the following steps in applying and/or identifying changes, which are evidenced from FIGS. 2-4: (FIG. 2, operations performed from the central controller’s perspective):

1. identify a change in the data store; → 2. notify the affected clients of the changed data; → receive request for the changed data;

(FIG. 3, operations performed from the configuration manager’s perspective):

1. receive notice of changed data; → 2. identify panels that contain the changed data... → push rotation set to client.

That is, at least based on FIG. 2 and the corresponding descriptions on paragraphs 44 and 45 on page 5 of Morgan, the identification/notification of clients is in response to “the identification of changes.” Morgan, page 5, para. 44 and FIG. 2. Furthermore, Morgan specifically discloses or suggests that the changes of data to be displayed are identified automatically: “First, a change in the information to be displayed is identified (step 205).”

Morgan, page 5, para. 44 and FIG. 2. Therefore, for at least the reasons above, Applicants submit that Morgan cannot anticipate embodiments of the invention as recited in amended claim 1. For example, Morgan fails to disclose at least the feature of “receiving the requested topology data from the memory area, said received topology data identifying the client **in response to the received request from the user;**” and “notifying the identified notification service of the change in the configuration data, wherein notifying includes **generating a notification manifest identifying the client, said notification manifest defining the change in configuration data and specifying the client affected by the change.**”

Therefore, claim 1 is patentable over the cited art. Similarly, dependent claims 2 to 10 depend from claim 1 and recite additional features to claim 1. Therefore, claims 2 to 10 are also patentable. Hence, the rejection of claims 1-10 under 35 U.S.C. §102(e) should be withdrawn.

Similarly, claims 11 and 17 recite similar features of **“receiving a request from a user to implement the change in configuration data,”** and obtaining a notification manifest from a memory area in response to the received notification, said notification manifest defining the change in the configuration data and specifying the client **in response to the received user request.”**

Because Morgan teaches away from embodiments of the invention by specifically disclosing a “push-based” or “upstream” delivery of changes to configuration data, Applicants submit that Morgan cannot anticipate claims 11 and 17. Claims 12 to 16 depend from claim 11, and claims 18 to 25 depend from claim 17, which are also patentable for at least the reasons above. Therefore, for at least the reasons above, Applicants submit that the rejection of claims 11 to 25 under 35 U.S.C. §102(e) should also be withdrawn.

Although the prior art made of record and not relied upon may be considered pertinent to the disclosure, none of these references anticipates or makes obvious the recited invention. The fact that Applicants may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicants’ agreement therewith.

Applicants wish to expedite prosecution of this application. If the Examiner deems the application to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the application in condition for allowance.

The Commissioner is hereby authorized to charge any deficiency or overpayment of any required fee during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,

/Tan-Chi Yuan/

Tan-Chi Yuan, Limited Recognition No. L0113
SENNIGER POWERS
One Metropolitan Square, 16th Floor
St. Louis, Missouri 63102
(314) 231-5400

JJB/ATY/tmg

Via EFS